

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

ROWAN FOWLER, *et al.*,

Plaintiffs,

v.

KEVIN STITT, *et al.*

Defendants.

Case No. 22-CV-00115-GKF-SH

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANTS' MOTION TO DISMISS AND REPLY IN SUPPORT OF
PLAINTIFF C.R.'S MOTION TO PROCEED PSEUDONYMOUSLY**

Plaintiffs, by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 7-1(g), respectfully move for an extension of their deadline to respond to both Defendants' Motion to Dismiss [Doc. 24] and Defendants' Response [Doc. 25] to Plaintiff C.R.'s Motion to Proceed Pseudonymously [Doc. 4] through September 30, 2022. Defendants do not object to this proposed extension. Plaintiffs submit the following in support:

1. Defendants filed their Motion to Dismiss [Doc. 24] on August 26, 2022.
2. On that same day, Defendants simultaneously filed their Response to Plaintiff C.R.'s Motion to Proceed Pseudonymously [Doc. 25].
3. Plaintiffs' current deadline to file their Response to Defendants' Motion to Dismiss is September 16, 2022.
4. Plaintiffs' current deadline to file a Reply in support of Plaintiff C.R.'s Motion to Proceed Pseudonymously is September 9, 2022.
5. Plaintiffs respectfully request a brief extension of time to file both their Response to Defendants' Motion to Dismiss and their Reply in Support of Plaintiff C.R.'s Motion to Proceed Pseudonymously through September 30, 2022.

6. Plaintiffs' request is made in good faith and not for the purpose of unnecessary delay.

Plaintiffs must respond simultaneously to both of Defendants' filings. Defendants have also raised interrelated arguments in both filings, and it would promote efficiency for Plaintiffs to file their response and reply briefs simultaneously. This Court previously granted Defendants two prior extensions of time [Docs. 9, 23] in which to file their responsive pleading and response to the motion to proceed pseudonymously. In addition, Plaintiffs' counsel has conflicting work and personal obligations in the period preceding the current deadlines.

7. This is Plaintiffs' first request for an extension.

8. Plaintiffs' requested extension should not impact any current deadlines.

9. Counsel for Defendants has indicated to Plaintiffs that Defendants do not object to the relief requested in this Motion.

10. For these reasons, Plaintiffs respectfully request this Court grant them an extension of time to file their Response to Defendants' Motion to Dismiss [Doc. 24] and Defendants' Response [Doc. 25] to Plaintiff C.R.'s Motion to Proceed Pseudonymously [Doc. 4] until September 30, 2022.

Respectfully submitted,

DATED: September 1, 2022

Respectfully submitted,

/s/ Nicholas Guillory
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 1, 2022, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to all ECF registrants, including counsel for Defendants Kevin Stitt, Keith Reed, and Kelly Baker.

/s/ Nicholas Guillory
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